

MICHAEL J. GARCIA
 United States Attorney for the
 Southern District of New York
 By: JOSEPH A. PANTOJA
 Assistant United States Attorney
 86 Chambers Street
 New York, New York 10007
 Tel. No. (212) 637-2785
 Fax. No. (212) 637-2750
 E-mail: joseph.pantoja@usdoj.gov

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----	x	
UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	07 Civ. 4651 (SHS)
-against-	:	
WILLIAM WRIGHT, 310 WEST 56th STREET	:	
CORPORATION, BAYVIEW LOAN	:	
SERVICING LLC, NEW YORK STATE	:	<u>NOTICE OF MOTION</u>
DEPARTMENT OF TAXATION AND	:	
FINANCE, AMERICAN EXPRESS CENTURION	:	
BANK, NEW YORK CITY DEPARTMENT OF	:	
FINANCE, and JOHN DOES 1-10,	:	
	:	
Defendants.	:	
-----	x	

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Plaintiff's Motion for Summary Judgment; the Rule 56.1 Statement in Support of Plaintiff's Motion for Summary Judgment; the Declaration of Carolyn Fields and exhibits attached thereto; the Declaration of Joseph A. Pantoja and exhibits attached thereto; and all the pleadings heretofore filed in this action, plaintiff United States of America, by its attorney, Michael J. Garcia, United States Attorney for the Southern District of New York, will move this Court before the Honorable Sydney H. Stein for summary judgment

pursuant to Rule 56 of the Federal Rules of Civil Procedure, specifically and an order (1) entering judgment against defendant William Wright (“Wright”) in the amount of \$401,608.62, with interest and additions accruing thereon as of June 9, 2008, according to law until the judgment is satisfied; (2) foreclosing the federal tax liens on Wright’s interest in the cooperative apartment 14A, 310 West 56th Street, New York, New York (the “Apartment”); and (3) decreeing that the federal tax liens shall be foreclosed by a sale of the Apartment, upon post-judgment motion for an order of sale to be filed by the United States.

PLEASE TAKE FURTHER NOTICE that, pursuant to the briefing schedule set by the Court, answering papers, if any, are due to be served upon the United States Attorney’s Office for the Southern District of New York, 86 Chambers Street, 3rd Floor, New York, New York 10007, on or before June 13, 2008, and the plaintiff’s reply papers, if any, are due to be served on or before June 20, 2008.

Dated: New York, New York
May 30, 2008

MICHAEL J. GARCIA
United States Attorney for the
Southern District of New York
Attorney for Plaintiff

By: /s/ Joseph A. Pantoja
JOSEPH A. PANTOJA
Assistant United States Attorney
86 Chambers Street
New York, New York 10007
Tel: (212) 637-2785
Fax: (212) 637-2750